

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Dorion Tyrique Bryant

Case: 2:21-mj-30456

Assigned To : Unassigned

Assign. Date : 9/27/2021

Description: CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

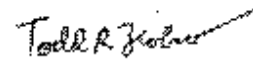
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2018 to August 2018 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1028(a)(1)	Producing false identification documents
18 U.S.C. § 1028(a)(2)	Transferring false identification documents
18 U.S.C. § 1028(a)(3)	Possession of 5 or more false identification documents
18 U.S.C. § 1028(a)(5)	Possessing a document-making implement or authentication feature
18 U.S.C. § 1028(a)(8)	Trafficking in false authentication features
18 U.S.C. §§ 1028A(a)(1) and (c)(4)	Aggravated identity theft
18 U.S.C. § 1029(a)(3)	Possession of 15 or more unauthorized access devices

This criminal complaint is based on these facts:

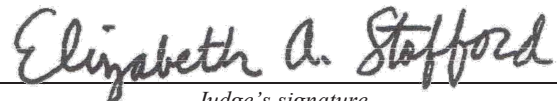
See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Inspector Todd R. Ziobro

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: September 27, 2021City and state: Detroit, MI

Judge's signature

United States Magistrate Judge Elizabeth A. Stafford

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT

I, Todd Ziobro, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1) I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I have been employed with the USPIS since April 2016. I am assigned to the Detroit, Michigan Division. I completed the Inspection Service’s Basic Inspector’s Training Academy, a twelve-week training in Potomac, Maryland, during which I developed investigative skills for investigating a variety of federal criminal offenses, including mail theft, mail fraud, and other financial crimes. Since November of 2019, I have been assigned to the Financial Crimes Team. In this capacity, I am responsible for investigating mail theft and various financial crimes involving the United States mail. During my work experience as a Postal Inspector, I have participated in numerous financial investigations including investigations involving identity theft and credit card fraud. Prior to becoming a U.S. Postal Inspector, I was a United States Customs and Border Protection Officer for seven years.
- 2) The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This

affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

CASE BACKGROUND

3) On June 15, 2018, an Express Mail Parcel (EE218198675US) addressed by a “Daniel Stevenson, 16XXX Lesure Street, Detroit, Michigan 48235”, was seized from the mail stream for further investigation by the USPIS. A search warrant to open the parcel was secured from the Eastern District of Michigan (Case: 2:18-mc-50923-1).

4) After opening the parcel, investigators found seven fraudulent state of Oregon driver’s licenses concealed in an empty Otterbox brand phone case. Three of the driver’s license’s bore the same photograph of a white female with red hair, however, each license contained a different name, DOB, address, license number and issue and expiration dates. Three of the driver’s license’s bore the same photograph of a white female with blonde hair, however, each license contained a different name, DOB, address, license number and issue and expiration dates. The seventh license bore the photograph of a white female with brown hair. The information contained on the driver’s licenses was compared with records from the Oregon Department of Motor Vehicles, which provided different photographs than those depicted on the licenses now in possession of the USPIS, indicating that the

identification was altered to misrepresent the true identity of the individual who intended to use it.

5) Throughout the course of the investigation, Inspector Maddox searched postal databases which revealed that between May 2018 – July 2018, “Daniel Stevenson” sent twenty-five Express Mail Parcels from the Taylor Post Office. The same phone number (313-918-6998) was listed as both the sender’s and receiver’s contact number on each of the twenty-five parcel labels.

6) On July 18, 2018, Inspector Maddox retrieved video surveillance of six incidents that corresponded with the previously located transactions made by the sender “Daniel Stevenson”. Only six of the twenty-two incidents were retained on surveillance footage at the Taylor Post Office due to the surveillance systems retention capabilities. The same male subject appears in all six recorded incidents, each time making over the counter transactions with a postal clerk on duty.

7) On July 18th, 2018, Inspector Maddox conducted surveillance at the Taylor Post Office. At approximately 5:03pm, Inspector Maddox observed an individual matching the description of the male witnessed on surveillance video exit a black Buick Verano (License plate number: DKY4943/MI) that pulled into and parked in the parking lot. The individual entered the Post Office carrying an object in his left hand. The subject returned to his vehicle a short time later and left the Post Office

empty handed. A search of law enforcement databases revealed that the license plate displayed on the vehicle returned to a **DORION TYRIQUE BRYANT**. A Michigan Secretary of State Driver's license photo for **DORION TYRIQUE BRYANT** was reviewed and it matched the male witnessed on surveillance footage making transactions in the name of Daniel Stevenson at the Taylor Post Office.

8) Inspector Maddox went inside the Post Office and spoke with the clerk that processed the transaction made by **DORION BRYANT**. She stated that **BRYANT** mailed two Express Mail Parcels and directed Inspector Maddox where the parcels were located with other outgoing mail.

9) Inspector Maddox located two Express Mail Parcels, "EM089099763US" and "EM089099750US" in the outgoing mail. Both Express Mail Parcels displayed the sender information of "Daniel Stevenson, 16XXX Lesure Street, Detroit, Michigan, MI 48235" which is the same sender information that was displayed on the previous suspicious Express Mail Parcel referenced in paragraph three (3). Both parcels were removed from the mail stream for further investigation.

10) On July 27, 2018, Inspector Maddox obtained a search warrant through the Eastern District of Michigan to open both parcels (case 18-mc-50923-2). Parcel EM089099763US contained three fraudulent state of Michigan driver's licenses

and Parcel EM089099750US contained two sheets of eight state of Illinois holographic images. These images were printed on a clear film to be used to simulate the hologram security feature found on genuine Illinois driver's licenses which are visible under UV light.

11) The three Michigan driver's licenses were run through the Michigan Secretary of State, which provided a different driver's license photo than that which was depicted on the outside of the physical license now in possession of the United States Postal Inspection Service, indicating that the identification was altered to misrepresent the true identity of the individual who intended to use it.

12) On July 31, 2018, Inspector Maddox interviewed victim D. R., whose Personal Identifying Information (PII) was on one of the Michigan identifications shipped by **DORION BRYANT**. The victim did not consent to the use of his PII and was unaware that he was the victim of identity theft. On August 9, 2018, Inspector Maddox interviewed victim D. J. R., whose PII was on one of the other identifications. D. J. R. stated he did not consent to the use of his PII and he was unaware of its use. The photograph on the identification bearing victim D.J.R.'s PII was later identified as that of another individual with the initials D. B., of Atlanta, GA. On August 27, 2021, Inspector Ziobro interviewed the third victim, J.D., whose PII was also found on one of the identifications. J.D. stated he was not

aware that anyone was in possession of his PII and did not give permission for anyone to use his PII.

13) On August 15, 2018, Postal Inspector Maddox obtained a federal search warrant for **DORION BRYANT**'s residence at 9XXX W. Pickwick Circle, Taylor, Michigan.

14) Per the lease agreement, **DORION BRYANT** was the sole leasee of 9XXX W. Pickwick Circle, Taylor, Michigan, on August 16, 2018.

15) On August 16, 2018, law enforcement executed the search warrant at 9XXX W. Pickwick Circle. At the time of entry, no person was inside the residence. In the basement of the residence, Postal Inspectors located equipment consistent with that of a fraudulent document production operation. Inspectors observed evidence indicating that this was **DORION BRYANT**'s workspace, including a photo on the desk, taped to a monitor, of **BRYANT**'S daughter, and business records containing his name. From that workspace, Inspectors confiscated eighty-eight fraudulent state identification cards, one hundred and sixteen financial transaction devices from multiple financial institutions in various customer names, a box containing the personal identifying information of eighty-seven different individuals, blank check stock, numerous computers, printers, embossers, cutters, card encoders, and sheets of holograms that were designed to mimic the

authentication features used on several state identification cards. The various implements, devices, and materials appeared to be specifically configured or primarily used for making a false identification document.

16) Among the items found was a “prototype” version of one of the fraudulent Oregon driver’s licenses bearing the photograph of the white female with red hair mentioned in paragraph 4. This “prototype” version did not have any replicated security features and was not cut to proper size. Located on the hard drive of one of the computers in the basement were images of all of the photographs used in making the identification cards listed in paragraphs 4 and 10.

17) Among the financial transaction devices recovered were thirty-seven credit cards issued by Wells Fargo to thirty-seven different customers. Wells Fargo Fraud Investigators confirmed that all 37 Wells Fargo credit cards were issued to legitimate customers, and 24 of them had been reported as fraud. These credit cards had been fraudulently ordered as replacements and mailed to various addresses in the metro Detroit area.

18) In early 2019, the U.S. Attorney’s Office was contacted by a lawyer who indicated that he represented Dorion Bryant. After an initial meeting on August 7, 2019 with all parties, including **DORION BRYANT** and the lawyer, efforts were made to set up another meeting without success.

- 19) On or about August of 2019, **DORION BRYANT** moved from the W. Pickwick Circle address to an unknown location. Review of various law enforcement and postal databases show **DORION BRYANT**, through search of his Social Security number, registered at different homes of family members.
- 20) On February 6, 2020, after repeated attempts to set up another meeting with all the parties, the lawyer noted in paragraph 18 advised the U.S. Attorney's Office that he no longer represented Bryant.
- 21) In August of 2020, a search of **DORION BRYANT**'s phone number through law enforcement databases revealed a utility bill at an apartment in Riverview, Michigan. On or about August 24, 2020, affiant observed **DORION BRYANT** exit the Riverview apartment building and depart driving a red Chevrolet Malibu. The Chevrolet Malibu was registered to **BRYANT**'s girlfriend, and the mother of his child, N. R. N.R. was also registered to the Riverview apartment in law enforcement and postal databases. **DORION BRYANT** was not linked to the Riverview apartment through any other way.
- 22) In February of 2021, a check of N.R. through law enforcement and U.S. Postal databases revealed a new address in Detroit, Michigan. Once again, **DORION BRYANT** was only linked to this address by his phone number on a

utility. On or about February 19, 2021, affiant observed a red Chevrolet Malibu backed into the driveway of the Detroit address.

23) On or about May 18, 2021, affiant observed an individual that resembled **DORION BRYANT** in the front yard of the Detroit address, who later departed in the red Chevrolet Malibu. The Malibu was identified as the same vehicle registered to N.R.

24) On August 20, 2021, affiant again observed the same individual at the Detroit address, and also observed that individual depart the residence in the red Chevrolet Malibu with a female subject that resembled N.R. and two children.

CONCLUSION

25) Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18 U.S.C. §§ 1028(a)(1) (producing false identification documents), 1028(a)(2) (transferring false identification documents), 1028(a)(3) (possession of five or more false identification documents), 1028(a)(5) (possessing a document-making implement or authentication feature), 1028(a)(8) (trafficking in false authentication features), Title 18 U.S.C. § 1028A(a)(1) and (c)(4) (aggravated identity theft – possession of a means of identification of another during any felony violation under 18 U.S.C.

1028), and Title 18 U.S.C. § 1029(a)(3) (possession of fifteen or more unauthorized access devices), have been committed by a **DORION BRYANT**.

Respectfully submitted,



TODD R. ZIOBRO
UNITED STATES POSTAL INSPECTOR

Sworn to before me and signed in my presence
and/or by reliable electronic means.



UNITED STATES MAGISTRATE JUDGE

Elizabeth A. Stafford